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10 Attorneys for Defendant  
LEE KEITH BRETT

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
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15 LFP IP, LLC,  
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17 Plaintiff,  
18  
19 v.  
20 LEE KEITH BRETT,  
21  
22 Defendant.  
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26  
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CASE NO. 2:16-cv-00166

Hon. Frederick F. Mumm

**JOINT EXHIBIT LIST**

Pretrial Conference: September 12, 2018

First Day of Trial: October 2, 2018

Pursuant to the Court's June 26, 2018 Order and Local Rule 16-6.1, Plaintiff LFP IP, LLC and Defendant Lee Keith Brett hereby submit the following joint exhibit list:

Exhibit No.	Description	Date Identified	Date Admitted
1	Registration certificate for HUSTLER® (U.S. Reg. No. 1,011,001) and related USPTO documents		
2	Registration certificate for the HUSTLER® mark for apparel items (U.S. Reg. No. 2689852) and related USPTO documents		
3	Registration certificate for the HUSTLER HOLLYWOOD® mark for retail store services (U.S. Reg. No. 4312312) and related USPTO documents		
4	Print outs from the "WHOIS" database for several domain names owned by LFP/LFP affiliates		
5	Registration certificate for the HUSTLER CLUB ® mark for night clubs (U.S. Reg. No. 2689852) and related USPTO documents		
6	Registration certificate for the HUSTLER CASINO® mark for casino services (U.S. Reg. No. 2479911) and related USPTO documents		
7	Registration certificate for the HUSTLER TV® mark for cable, satellite, television and video-on-demand (VOD) broadcasting. HUSTLER TV® (U.S. Reg. No. 3008950) and related USPTO documents		
8	Various images of t-shirt graphic designs and styles utilized by LFP		
9	Various images of graphic designs, t-shirts and merchandise depicting LFP's use of the "Hardcore Since '74" slogan and number "74"		

1	10	Additional HUSTLER U.S. Trademark Registrations owned by LFP		
2				
3	11	HustlerHollywood.com screen captures		
4	12	Defendant's U.S. Trademark Application filed on June 10, 2015 (Printout of USPTO Records)		
5				
6	13	Images from AmericanHustlerClothing.com website dated June 23, 2015		
7				
8	14	Images from angel.co website displaying "American Hustler Clothing" items for sale dated October 29, 2015		
9				
10	15	Images from "American Hustler Clothing" Facebook pages		
11	16	September 9, 2015 Letter of Protest submitted by LFP to the USPTO		
12	17	USPTO's Letter of Protest Memorandum		
13	18	October 22, 2015 USPTO Office Action issued in response to AMERICAN HUSTLER application Ser. No. 86657943		
14				
15	19	January 10, 2016 USPTO Final Office Action issued to AMERICAN HUSTLER application Ser. No. 86657943		
16				
17	20	Printout of the Registrar's WHOIS information pertaining to the www.americanhustlerclothing.com domain name		
18				
19				
20	21	Screen capture of the website located at AmericanHustlerClothing.com dated November 9, 2015		
21				
22	22	Images of Defendant's t-shirts using terms such as "original" from website located at AmericanHustlerClothing.com		
23				
24	23	Images of Defendant's t-shirts referring to 1974 from website located at AmericanHustlerClothing.com		
25				
26	24	Images of Defendant's t-shirts that incorporate graphics associated with gaming and poker from website located at AmericanHustlerClothing.com		
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1	25	Image of Defendant's t-shirt referred to as "Hustler Ladies" from website located at AmericanHustlerClothing.com		
2				
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4	26	November 2015 cease and desist letter to Defendant with attached screen shots from the AmericanHustlerClothing.com website		
5				
6	27	Printout of entry regarding The Hustler (movie) from the website IMDb.com		
7				
8	28	Printout of entry regarding The Color of Money (movie) from the website IMDB.com		
9				
10	29	Printout of Merriam Webster Dictionary definition of the term "Hustler"		
11	30	Printout of article entitled <i>An Amazing Story of America's greatest hustler</i> – Post and Courier News		
12				
13	31	Printout of Wikipedia.com entry regarding the term "Hustling"		
14				
15	32	Printout of Lyrics to song Hustler, by "50 Cent," from Genius Lyrics		
16	33	Printout of Google Search results for "1974 t shirts"		
17	34	Printout of Google Search results for "Spade t shirts"		
18				
19	35	Printout of "About Us" section from American Hustler Clothing Website		
20	36	Images of each design sold by American Hustler		
21	37	Hustler T Shirt – Walmart.com		
22	38	Printout of Walter Tevis, <i>The Hustler</i> (novel) from Amazon.com		
23				
24	39	American Pool players Association, bio of Lee Brett		
25	40	Printout of Google Search Results "Lee Brett apa"		
26	41	Printout of an article from Billiards Digest, <i>Brett Building His Business One Stroke at a Time.</i>		
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1	42	Print out of Google search results “original brand t shirt”		
2				
3	43	Print out of Google search results “genuine authentic logo”		
4	44	Printout of lyrics to <i>U Don’t Kno</i> by Jay Z from website Genius		
5	45	Printout of lyrics to <i>Hustler Musik</i> by Lil’ Wayne from website Genius		
6				
7	46	Hustler Clothing design .jpeg – All I Need (men)		
8	47	Hustler Clothing design .jpeg – Fell in Love t-shirt		
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10	48	Hustler Clothing design .jpeg – Bitches Ain’t Shit		
11	49	Hustler Clothing design .jpeg – Repeat suck t-shirt		
12	50	Hustler Clothing design .jpeg – First Date t-shirt		
13				
14	51	Hustler Clothing design .jpeg – Til I am Dead T Shirt		
15	52	Hustler Clothing design .jpeg – 2 is Better than 1		
16	53	Plaintiff’s Response to Defendant’s First request for Admission – No survey evidence collected.		
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19	54	Image of photograph posted on Facebook by Hustler Hollywood		
20	55	Image of photograph posted on Facebook by Hustler Hollywood		
21				
22	56	Image of photograph posted on Facebook by Hustler Hollywood		
23	57	Image of photograph posted on Facebook by Hustler Hollywood		
24	58	Image of photograph posted on Facebook by Hustler Hollywood		
25				
26	59	Amazon.com search results for “hustler t shirt”		
27	60	TESS Search Result: “Hustler Hollywood”		
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1	61	“Pool hall expert: How to get hustled” article from CNN.com		
2	62	FASO Clothing hustler clothing result		
3	63	Hustlerturf.com clothing search - Hustler Gear		
4	64	Hustlerturf.com clothing search Hustler Gear		
5	65	Hustlerturf.com clothing search Hustler Gear		
6	66	Hustlerturf.com clothing search Hustler Gear		
7	67	Hustlerturf.com clothing search Hustler Gear		
8	68	Hustlerturf.com clothing search Hustler Gear		
9	69	Hustlerturf.com clothing search Hustler Gear		
10	70	Hustlerturf.com clothing search Hustler Gear		
11	71	Hustlerturf.com clothing search Hustler Gear		
12	72	Print out of “The Hustler” (TV Series 2015- ) – IMDb.com		
13	73	Photograph of LFP document production - Facebook BCA nationals		
14	74	Photograph of LFP document production Hustler spring summer 2007		
15	75	Photograph of LFP document production American hustler what we are about		
16	76	Photograph of LFP document production Respect the game design		
17	77	Photograph of LFP document production American hustler website		
18	78	Photograph of LFP document production Hustler bang me		
19	79	Photograph of LFP document production Respect the game		
20	80	Photograph of LFP document production Facebook APA nationals		

1	81	Photograph of LFP document production Facebook American hustler clothing		
2	82	Photograph of LFP document production Philippines design		
3	83	Photograph of LFP document production Hustler cover spring summer 2007		
4	84	Photograph of LFP document production American hustler clothing April Garcia Photograph of LFP document production LFP		
5	85	Photograph of LFP document production Calendar 2007		
6	86	Photograph of LFP document production American Hustler products		
7	87	Photograph of LFP document production American Hustler clothing Facebook		
8	88	Photograph of LFP document production American Hustler clothing cover photo		
9	89	Photograph of LFP document production Run out pool		
10	90	Photograph of LFP document production American Hustler clothing APA		
11	91	Photograph of LFP document production American Hustler clothing angel investment		
12	92	Photograph of LFP document production American Hustler let's gamble		
13	93	Photograph of LFP document production Looking for pool rooms		
14	94	Photograph of LFP document production We decided to start American Hustler clothing		
15	95	Photograph of LFP document production American Hustler clothing women L		
16	96	Photograph of LFP document production American Hustler clothing in your pool room		
17	97	Photograph of LFP document production Hustler high voltage		

1	98	Photograph of LFP document production New design for the avid pool player		
2	99	Photograph of LFP document production table of contents license		
3	100	Photograph of LFP document production The American Hustler journey		
4	101	Photograph of LFP document production Regular tees beaver licker		
5	102	Photograph of LFP document production Pool players never sleep		
6	103	Photograph of LFP document production American Hustler update		
7	104	Photograph of LFP document production Hustler honeys 12307		
8	105	Photograph of LFP document production American Hustler men		
9	106	Photograph of LFP document production King of billiards		
10	107	Print out of American Apparal hustler t shit – Amazon.com		
11	108	Photograph of LFP document production Threads and accessories license agreement		
12	109	Photograph of LFP document production American Hustler Facebook APA 8 ball event		
13	110	Photograph of LFP document production AZ billiards review		
14	111	Photograph of LFP document production Respect the game		
15	112	Photograph of LFP document production Design for BCA nationals		
16	113	Photograph of LFP document production Products for sale		
17	114	Photograph of LFP document production Facebook post BCA nationals		
18	115	Photograph of LFP document production hustler tee woman bent over		
19	116	Photograph of LFP document production Facebook post APA nationals		
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1	117	Photograph of LFP document production LFP licensees contact details		
2	118	Photograph of LFP document production Richard from Texas		
3	119	Photograph of LFP document production Got action 1971		
4	120	Photograph of LFP document production Ladies burnout		
5	121	Print out of “Encyclopedia of Pool Hustlers” – Amazon.com		
6	122	Results of USPTO Trademark Searches		
7	123	Wikipedia.com search result - The Color of Money (movie)		
8	124	Definition of a Hustler – dictionary.com		
9	125	“1974 t-shirts” search results print out – Google Search		
10	126	“spade shirts” search result print out – Google Search		
11	127	American Hustler clothing Website – americanhustlerclothing.com		
12	128	American Hustler Website – americanhustlerclothing.com		
13	129	NIKE full time hustler tee – Google Search results		
14	130	Print out of search results for “hustler t shit” – Walmart.com hustler		
15	131	“Hustler” USPTO Search results		
16	132	Print out of HustlerHollywood.com		
17	133	Lee Brett pool		
18	134	Google.com search results “Hustler Songs”		
19	135	Jay Z Hustler lyrics print out		
20	136	Hustler music little Wayne – Wikipedia.com		
21	137	Amazon.com search results “hustler”		
22	138	Hustlerturf.com clothing search Hustler Gear		
23	139	Hustlerturf.com clothing search Hustler Gear		

1	140	Hustlerturf.com clothing search Hustler Gear		
2	141	Hustlerturf.com clothing search Hustler Gear		
3	142	Hustlerturf.com clothing search Hustler Gear		
4	143	Hustlerturf.com clothing search Hustler Gear		
5	144	Hustlerturf.com clothing search Hustler Gear		
6	145	Hustlerturf.com clothing search Hustler Gear		
7	146	Hustlerturf.com clothing search Hustler Gear		
8	147	Hustlerturf.com clothing search Hustler Gear		
9	148	Hustlerturf.com clothing search Hustler Gear		
10	149	Print out of “American Hustler” logo and “Hustler” logos		
11	150	Print out of American Hustler website – americanhustlerclothing.com		
12	151	Print out of Pokerplayer.com article – “W.C. Fields Humorist and Hustler”		
13	152	Print out of “A Century Ago: billiards Mad, A Game of Pool, and Pool Sharks” from billiardsmovies.com		
14	153	Printout of quotes using the term “hustler” – brainyquote.com		
15	154	Print out of “The Hustlers: Sixties band reforms 50 years on after discovering one member wasn’t dead after all” – theweatherchannel.com		
16	155	Image of American Hustler logo “Respect this game” .jpeg		
17	156	Print out of multiple “hustler” brand pornographic websites		
18	157	“hustler t shirt” results by Adidas – Ebay.com		

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1	158	“hustler t shirt” results by Nike –		
2		Ebay.com		
3	159	Print outs of various articles on Lee Brett		
4		and the pool industry		
5	160	USPTO search results for Adidas –		
6		TESS.com		
7	161	American Hustler trademark application		
8		office action		
9	162	Print out of the Complaint describing		
10		Hustler brand channels of trade		
11	163	American Hustler designs using 1971 and		
12		1974		
13	164	Print out of “pool hustler clothing”		
14		Google.com search results		
15	165	Hustler Hollywood sex shop opening in		
16		West Covina – SGVTribune.com		
17	166	Print out of Hustler Hollywood website –		
18		Hustlerhollywood.com		
19	167	Lee Brett news article –		
20		Behindtherocktour.com		
21	168	USPTO search result for “Hustle”		
22		trademark for graphic tees – TESS.com		
23	169	Loveoflifequotes.com – Jay Z Hustle Lyric		
24	170	Hustler t shirt results – Spreadshirt.com		
25	171	Print out Hustler t-shirt results		
26	172	Male Prostitution in the arts –		
27		Wikipedia.com		
28	173	Queens. Hookers. And hustlers article – Nt		
		Yr Cister Press		
	174	Print out of The American Hustler (1972)		
		movie – IMDb.com		
	175	Hustler clothing for sale print outs		
	176	Print outs - Hustler Facebook screen shots		
		and Hustler ebay.com merchandise		
	177	Hustlerturf.com clothing search Hustler		
		Gear		
	178	Hustlerturf.com clothing search Hustler		
		Gear		
	179	American Poolplayers Association –		
		Tournament information		

180	American Poolplayers Association – Wikipedia.com		
181	Screen shot Baltimore Hustler t-shirt		
182	Photograph of LFP document production Girl on Girl		
183	Printout of Danny McGoorty, A Billiard Hustler's Life (book) from Amazon.com		
184	Printout of David McCumber, Playing off the Rail: A Pool Hustler's Journey (book) from Amazon.com		
185	Printout of R.A. Dyer, Hustler Days: Minnesota Fats, Wimpy Lassiter, Jersey Red, and America's Great Age of Pool (book) from Amazon.com		
186	Printout of Robert LeBlanc, Confessions of a Pool Hustler (book) from Amazon.com		
187	Printout of Robert Byrne, A Pool Room Hustler (book) from Amazon.com		

Dated: August 22, 2018

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

By: /s/ Jason D. Strabo

Jason D. Strabo  
Attorneys for Defendant  
LEE KEITH BRETT

Dated: August 22, 2018

Respectfully submitted,

LIPSITZ GREEN SCIME CAMBRIA  
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**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-4.3.4, I hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

By: /s/ Jason D. Strabo

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